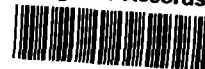




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

EPA Region 5 Records Ctr.



236948

REPLY TO ATTENTION OF:
5HS-12

MEMORANDUM

DATE: JAN 04 1991

SUBJECT: ACTION MEMORANDUM - Request for a Removal Action at the American Pouch Site, Chicago, Illinois (Site ID # LJ)

FROM: Peter Guria, On-Scene Coordinator
Emergency & Enforcement Response Branch, Section II

TO: David A. Ullrich, Director
Waste Management Division

THRU: Robert J. Bowden, Chief
Emergency & Enforcement Response Branch

PURPOSE

The purpose of this Memorandum is to obtain your approval to expend up to \$150,268 to mitigate threats to human health and the environment posed by the presence of uncontrolled hazardous waste located at the American Pouch Site, 4603 W. Gladys, Chicago, Illinois 60644. On November 19, 1990 a Removal Action was initiated under \$50,000 verbal authority to stabilize and secure threats posed at the site. The proposed removal action seeks to abate future releases by removing reactive, volatile, corrosive, and flammable laboratory chemicals and drums containing volatile organic solvents. It is estimated that the removal action will require 15 on-site working days to complete.

SITE CONDITIONS

The proposed removal action at the American Pouch site is a time critical emergency due to conditions at the site. Access to the building is unrestricted and continued deterioration of laboratory chemical containers, drums, and building could potentially cause mixing of incompatible materials resulting in an explosion and fire and/or release of toxic fumes. The Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) ID number for the site is ILD984807669.

BACKGROUND

The American Pouch Site is located at 4603 West Gladys, Chicago, Illinois 60644. The site is situated in a residential neighborhood on Chicago's west side and is comprised of a two story production and warehouse building located on approximately one acre of land. The site is bordered to the north by a park, to the south by a floor covering manufacturer and residential home, to the east by a railroad, and to the west by a parking lot.

Very few records exist on former tenants of the building. It is believed that a food packaging company, American Pouch Foods, Inc. (APF), produced C-rations under contract with the United States Army (U.S. Army) from 1978 until the facility's closure in 1983. Records found on site indicated that APF utilized several different processes in the manufacture of C-rations. The building contained an on site microbiology and chemical laboratory for quality control and assurance of their products.

According to local residents, the building remained vacant after APF departure and was a target of vandalism. It also became a dumping ground for household trash, building debris, garbage, and other solid waste.

On October 28, 1990, the Chicago Fire Department (CFD) responded to a fire at the site and found several drums and numerous small containers of laboratory chemicals. The fire department's Hazardous Investigation Team (HIT) compiled an inventory of materials found on site and forwarded this information to the City of Chicago, Department of Consumer Services. This inventory can be found in Attachment I, "Chemical Inventory".

On November 14, 1990, the City of Chicago, Energy and Environment Division contacted the United States Environment Protection Agency (U.S. EPA) and informed them of the present situation at the site.

On November 15, 1990, the U.S. EPA Technical Assistance Team (TAT) performed an emergency site assessment at the facility. An estimated 250 laboratory containers containing acids, bases, hydroxides, and peroxides were observed scattered throughout the first and second floors of the building. Approximately 30 drums were also observed. Air monitoring of the drums conducted with a photoionization detector (HNU), revealed 25 to 100 units above the background level of 1.0 unit. A large compressed gas cylinder containing flammable acetylene was found to be easily accessible on the first floor. Stained soil was observed on the south-central side of the building below several vandalized transformers suspected of containing PCB oil. Access to the building is unrestricted. Garage doors and first floor windows had been removed and evidence of vagrants living in the building was observed.

The site is situated in a residential neighborhood on a dead end street. The building has been the target of repeated vandalism. One transformer suspected of containing PCB oil has released its contents in an attempt by vandals to remove valuable copper. Several drums have been overturned and laboratory chemical containers broken, releasing their contents. The mixing of incompatible materials could potentially cause an explosion and fire, and/or release of deadly toxic fumes that could potentially affect the nearby residence. A small city park is directly across the street and children have been observed in the past playing throughout the structure.

The site is not on the National Priorities list (NPL).

THREAT TO HUMAN HEALTH OR WELFARE OR THE ENVIRONMENT

Conditions at the American Pouch Site present an imminent and substantial endangerment to human health and the environment based upon factors set forth in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR 300.415 (b) (2). These factors include:

- a. "Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants";

Currently site access is unrestricted and the potential for exposure to contaminants via direct contact is high. Laboratory chemicals found on site include various acids and bases that cause severe burns when in contact with the skin. Toxic vapors given off by these materials can cause respiratory failure. The site is located in a residential neighborhood and has a public park and residence within 30 feet. Clothing and other personal belongings have been found, indicating that vagrants have been living within the building. Several dogs have also been observed living in the building and may be tracking spilled materials off-site.

- b. "Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release";

Drums have been observed on-site in various stages of deterioration. Air monitoring conducted from these drums revealed HNu levels from 25 to 100 units indicating the presence of volatile compounds. Some drums have been observed on their sides releasing their contents.

- c. "Threat of fire and explosion";

Several Laboratory chemicals have been found on site that are incompatible when mixed together. Several oxidizing agents have been found, and when mixed with acid, can cause violent reactions. Sodium hydroxide is a very strong base and when in the presence of water can produce enough heat to ignite other combustible material. A cylinder of highly flammable acetylene has been found dating back to 1950. The construction of these older cylinders made them susceptible to explosion if they were handled incorrectly. A number of containers of ammonium chloride have been also found on site. This chemical can become explosive when exposed to heat and can give off toxic ammonia vapors once ignited and allowed to burn.

- d. "The availability of other appropriate federal or state response mechanism to respond to the release";

The Illinois Environmental Protection Agency (IEPA) does not have current funding available to respond to this time critical removal.

ENDANGERMENT DETERMINATION

Due to the conditions present at this site, actual or threatened releases of hazardous substances, if not addressed by implementing the response action proposed in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

PROPOSED PROJECT AND COSTS

The purpose of this removal action is to mitigate the imminent and substantial threats posed to public health, or welfare, or environment. Removal activities at the site include: staging, inventory, compatibility testing, and lab packing of all laboratory chemical containers which will be transported to a RCRA-approved incineration facility; staging, sampling, overpacking, and transport of drums to a RCRA-approved incineration facility; and, the excavation, transport, and disposal of contaminated surface soil at a RCRA-approved facility.

The following removal activities are proposed:

- 1) Develop and implement site safety and security measures.
- 2) Implement an air monitoring program.
- 3) Stage, inventory, characterize, and secure (lab pack) all laboratory chemical containers.
- 4) Stage, sample, characterize, and secure (overpack) all drummed materials.
- 5) Conduct a sampling program to determine the type (suspected PCB) and extent of soil contamination.
- 6) Transport and dispose of all characterized waste at a RCRA/CERCLA approved disposal facility.

The detailed clean up contractor costs are presented in Attachment II and estimated project costs are summarized below:

EXTRAMURAL COSTS

Clean up Contractor	\$ 98,000
Contingency (15%)	<u>14,700</u>
Subtotal	\$112,700
TAT/TES	<u>\$ 6,750</u>
Extramural Subtotal	\$119,450
Extramural Contingency (15%)	<u>\$ 17,918*</u>
TOTAL EXTRAMURAL COSTS	\$137,368

INTRAMURAL COSTS

U.S. EPA Direct Costs [\$30/hr x (150 Regional + 15 HQ hrs)]	\$ 4,950
U.S. EPA Indirect Costs [\$53/hr x (150 Regional hrs)]	<u>7,950</u>
TOTAL, INTRAMURAL COSTS	\$ 12,900
TOTAL REMOVAL PROJECT CEILING ESTIMATE	\$150,268

* This contingency could be committed as needed between the clean up contractor and TAT/TES.

Removal activities will require approximately 15 on site working days to complete. The removal of laboratory chemical containers, drummed wastes, and contaminated surface soil is consistent with any long-term remedial action which may be required.

CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED

Presently, conditions at the site could lead to increased health risks to the surrounding neighborhood should action be delayed. Access to the building remains unrestricted and continued vandalism and vagrancy could lead to a release of hazardous materials and exposure to local residents.

OUTSTANDING POLICY ISSUES

There are no outstanding policy issues associated with the American Pouch site at the present.

ENFORCEMENT

Please see Attachment III "Enforcement Sensitive Information"

RECOMMENDATION

This decision document represents the selected removal action for the American Pouch Site, in Chicago, Illinois, developed in accordance with CERCLA as amended by SARA, and to the extent practicable, the National Contingency Plan. This decision is based upon the administrative record for the site. Attachment IV identifies the items that comprise the administrative record upon which the selection of the removal action is based.

Because the conditions at the American Pouch Site in Chicago, Illinois, meet the National Contingency Plan, Section 300.415 (b)(2), criteria for a removal action, your approval of this request is recommended. The estimated total project costs are \$150,268.00, of which up to \$137,368, is for extramural contractor costs. You may indicate your decision by signing below.

APPROVE:

David A. Ullrich
DIRECTOR, WASTE MANAGEMENT DIVISION

DATE:

1/4/91

DISAPPROVE:

DIRECTOR, WASTE MANAGEMENT DIVISION

DATE:

Attachments

- I. Chemical Inventory
- II. Detailed Cleanup Contractor Cost
- III. Enforcement Addendum
- IV. Index to Administrative Record

bcc: T. Johnson, OS-210
L. Peterson/A. Liebling, 5CS-TUB-3
A. Bauman, 5HS-12
R. Powers/R. Buckley, 5HS-GI
R. Bowden, 5HS-12
P. Schafer, 5HS-12
J. Barnette, 5HS-12
M. Messersmith, 5HS-12
L. Fabinski, ATSDR, 5HS-10
O. Warnsley, RP/CRU, 5HSM-TUB-7
T. Lesser, 5PA-14
P. Guria, 5HS-12
L. Martinez, 5MCC-TUB-4
EERB Read File
EERB Delivery Order File (C. Brasher)
EERB Site File

ATTACHMENT I
CHEMICAL INVENTORY
CHICAGO FIRE DEPARTMENT
HAZARDOUS INVESTIGATION TEAM (HIT)

CALCIUM CHLORIDE
OIL LUBRICANT
55 GALLON DRUMS OF XYLOL, FLAMMABLE SOLVENT
3-44 GALLON DRUMS OF UNKNOWN CONTENTS
1-100 LB ACETYLENE COMPRESSED GAS CYLINDER
SODIUM SULFATE, UNKNOWN QUANTITY
5-GALLON CONTAINERS OF LUBE AND DRYWALL COMPOUND
1-GALLON, SODIUM THIOSULFATE
SULFURIC ACID, 9-LBS
3-4 LB CONTAINERS OF AMMONIUM HYDROXIDE
32-OZ. IODINE-BROMINE SOLUTION
32-OZ. AMMONIUM CHLORIDE
1-GALLON SODIUM HYDROXIDE
9-LBS CHROMIUM SULFATE
5-LBS ACETIC ACID
6-LBS HYDROCHLORIC ACID
SODIUM HYDROXIDE, UNKNOWN QUANTITY

ATTACHMENT II
DETAILED CLEANUP CONTRACTOR COST ESTIMATE
AMERICAN POUCH SITE

The estimated clean up contractor costs are as follows:

ERCS Personnel	\$35,000
ERCS Equipment	10,000
ERCS Subcontractors	5,000
Sampling and Analytical	15,000
Transportation and Disposal	<u>33,000</u>
TOTAL	\$98,000

ATTACHMENT III

ENFORCEMENT ADDENDUM

American Pouch Site
Chicago, Illinois
November, 1990

Redacted-information not relevant to selection of removal action.

ATTACHMENT IV
INDEX TO THE ADMINISTRATIVE RECORD
FOR
AMERICAN POUCH SITE

Chicago, Illinois

December 19, 1990

<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
11/09/90	Ferg, J., City of Chicago, Dept. of Consumer Services	Mutz, R., City of Chicago, Director of Toxic Pollution Control	Memo on abandoned building/material identification	6
11/14/90	Guria, P. U.S. EPA	Ferg, J., City of Chicago, Dept. of Consumer Services	Phone conversation record	2
00/00/00	TAT	U.S. EPA	Site assessment/ analytical results (pending)	